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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

**MARK DANIEL HOSPITALITY
LLC (d/b/a INC)**

Plaintiff,

v.

**AMGUARD INSURANCE
COMPANY**

Defendant.

NO. 3:20-cv-06772-FLW-TJB

NOTICE OF MOTION

TO: Susan M. Leming, Esquire
Brown & Connery, LLP
360 Haddon Avenue
P.O. Box 539
Westmont, New Jersey 08108

Kerri E. Chewing, Esquire
Archer & Greiner, P.C.
One Centennial Square
Haddonfield, New Jersey 08003

Attorneys for Defendant

PLEASE TAKE NOTICE THAT, Plaintiff Mark Daniel Hospitality LLC (d/b/a INC), by and through its undersigned counsel of record, shall move the United States District Court for the District of New Jersey, before the Honorable

Freda L. Wolfson, U.S.D.J., at the Clarkson S. Fisher Building & U.S. Courthouse, Trenton, New Jersey, on July 20, 2020, for an order remanding this case to New Jersey state court.

PLEASE TAKE FURTHER NOTICE THAT Plaintiff shall rely upon its Memorandum of Law and Certification of Ralph P. Ferrara, Esquire and the accompanying exhibits in support of its Motion.

PLEASE TAKE FURTHER NOTICE THAT Plaintiff respectfully requests oral argument, should this motion be opposed.

Respectfully submitted,

FERRARA LAW GROUP, P.C.

DATE: June 26, 2020

BY: /s/ Ralph P. Ferrara
RALPH P. FERRARA, ESQUIRE
Attorney for Plaintiff Mark Daniel
Hospitality LLC (d/b/a INC)